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Hearing Date: February 10, 2010
Opposition Due By January 28, 2010

Attorneys for Movant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
MOTORS LIQUIDATION COMPANY	:	Chapter 11
f/k/a GENERAL MOTORS	:	
CORPORATION	:	Case No. 09-50026 (REG)
Defendant.	:	
	:	Jointly Administered
	:	

**NOTICE OF MOTION OF PLAINTIFFS IN THE ACTION
ENTITLED *SIDNER et al. v. GENERAL MOTORS CORPORATION*,
FOR ENTRY OF AN ORDER GRANTING RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)(1)**

PLEASE TAKE NOTICE that, pursuant to his Motion submitted herewith, the authorities cited therein, and the referenced Exhibit(s) attached thereto, Movant, David Sidner (“**Movant**”), will move this Court, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Courtroom 621 at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **February 10, 2010, at 9:45 a.m.**, for an order modifying the automatic stay pursuant to Section 362(a) of Title 11 of the United States Code and Rule 4001 of the Federal Rules of Bankruptcy to enable **Movant** to proceed with his action, brought on behalf of himself and all others similarly

situated, captioned *Sidner et al. v. General Motors Corporation*, 2:07-cv-0892-FCD-GGH, and pending in the United States District Court for the Eastern District of California, for breach of express warranty and related claims against General Motors Corporation (“GM” or the “Debtor”).

Dated: January 11, 2010

By: /s/Patrick A. Klingman
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CERTIFICATE OF SERVICE

I hereby certify that, on this 11th day of January, 2010, the foregoing Notice of Motion, together with supporting Motion and referenced Exhibit(s), attached thereto, were filed electronically with the United States Bankruptcy Court for the Southern District of New York via the ECF system. Courtesy copies of the foregoing were also sent to:

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